

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 04/08/03 – 1155
Site Contact(s): C. J. Freiboth (KH) – (CJF-053)
Phone: (303) 966-2823
Regulatory Contact: James Hindman, CDPHE
Phone: (303) 692-3345
Agency: CDPHE

Purpose of Contact: State (CDPHE) concurrence on Work Package T0110699 – Building 444: Remove Process Waste Equipment from Building 444 Hot Side

Meeting Attendance

C. J. Freiboth, KH PM James Hindman, CDPHE

Discussion

On October 23, 2002, at 1355, a copy of Work Package T0110699 – Building 444: Remove Process Waste Equipment from Building 444 Hot Side, was provided to the State (Hindman).

On December 18, 2002, at 1030, a walkdown of some of the process waste items discussed in T0110699, was conducted with the State (Hindman).

On December 26, 2002, at 1437, during a meeting with the State (Hindman), concurrence was provided to conduct the activities (process waste removal) in the basement of Building 444 as described in T0110699.

On February 20, 2003, at 1735, State (Hindman) concurrence was provided to conduct the activities (process waste removal) for rooms 143J, 205, 212A, 212B, and 245C of Building 444 as described in T0110699. In addition, the State (Hindman) had the following questions related to the remaining items listed in Work Package T0110699. The responses to the comments/questions were provided to the State (Hindman) on February 26, 2003 at 0734.

Question 1 – The “Hot Side Process Waste Equipment List, Bldg 444” shows items in rooms 101, 101B, 101H, and 109. However, items in these rooms are not specifically

Contact Record 04/08/03

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
08X-105-01

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 04/08/03 – 1155

Site Contact(s): C. J. Freiboth (KH) – (CJF-053)
Phone: (303) 966-2823

Regulatory Contact: James Hindman, CDPHE
Phone: (303) 692-3345

Agency: CDPHE

Purpose of Contact: State (CDPHE) concurrence on Work Package T0110699 – Building 444: Remove Process Waste Equipment from Building 444 Hot Side

Meeting Attendance

C. J. Freiboth, KH PM James Hindman, CDPHE

Discussion

On October 23, 2002, at 1355, a copy of Work Package T0110699 – Building 444: Remove Process Waste Equipment from Building 444 Hot Side, was provided to the State (Hindman).

On December 18, 2002, at 1030, a walkdown of some of the process waste items discussed in T0110699, was conducted with the State (Hindman).

On December 26, 2002, at 1437, during a meeting with the State (Hindman), concurrence was provided to conduct the activities (process waste removal) in the basement of Building 444 as described in T0110699.

On February 20, 2003, at 1735, State (Hindman) concurrence was provided to conduct the activities (process waste removal) for rooms 143J, 205, 212A, 212B, and 245C of Building 444 as described in T0110699. In addition, the State (Hindman) had the following questions related to the remaining items listed in Work Package T0110699. The responses to the comments/questions were provided to the State (Hindman) on February 26, 2003 at 0734.

Question 1 – The “Hot Side Process Waste Equipment List, Bldg 444” shows items in rooms 101, 101B, 101H, and 109. However, items in these rooms are not specifically

Contact Record 04/08/03

included in the associated Closure Decision Document (CDD). Please resolve this apparent discrepancy. Additionally, the list has the comment, "under evaluation" for item #1 (PW Sink #3) located in room 101. What is meant by this comment? The floor plan with the CDD shows PW Sink #2 near PW Sink #3 in the same room. Does PW Sink #2 still exist and if so, should it have been included in the CDD?

Question 1 Response

Room 101, Sink #3 - The room number may be the cause of some confusion. The sink is located on west side of the wall separating rooms 101 and 170. There was a water fountain, not Sink #2, to the south of the sink that was previously removed.

The comment "under evaluation" was in the notes section of the equipment list because there was confusion on whether or not the drain went to a sanitary or process waste drain line. Investigation indicates that the sink drains to a process waste line. This is shown on Detail 24 of Drawing 25838-0028, "Replace Uninspectable Process Waste System." The sink was used for sanitary purposes and is clearly labeled as such. Connection to the process waste line was done as a matter of convenience. The drain lines will be removed and disposed of as hazardous process waste. The sink will be disposed of as sanitary, low level waste. The work steps in the package will be changed accordingly.

Room 101B, PW Sump - This item is shown on the CDD drawing, but the room number is not listed in the text. The sump will be removed as part of the PW package and is an addition to the CDD room list.

Room 101H, UL Sump - The room number should be listed as T101H. This item is shown on the CDD drawing, but the room number is not listed in the text. The sump will be removed as part of the PW package and is an addition to the CDD room list.

Question 2 – Is there a fourth sink in room 109B as shown on the floor plan with the CDD? If so, why is this not included in the work package?

Question 2 Response

Room 109B, Sinks 1-3 - The work package lists 3 sinks and there are 3 sinks numbered on the CDD drawing. Sink #2 is actually 2 sinks installed as a double sink. The double sink will be removed as 1 unit. (Photographs were provided to the State).

On March 3, 2003, at 1101, the State (Hindman) had an additional question related to the items in Room 143. Specifically, the text in the work document states that the sink is a process waste sink – all other documents list this as a sanitary sink. Is this a typo?

On March 3, 2003, at 1129, the State (Hindman) was contacted and was informed that this was a typo, and that it is a sanitary sink. Based on this, State (Hindman) concurrence was provided to complete the activities (process waste removal) for the remainder of the first floor of Building 444 as described in T0110699. In addition, the State (Hindman) asked to resolve discrepancies related to why the Work Package lists 22 tanks in Room 212, while the CDD lists 23, and the Work Package lists 14 tanks in Room 245, while the

Contact Record 04/08/03

CDD lists 34. Responses to these two items were emailed to the State (Hindman) on March 17, 2003, at 1459 and are summarized as follows:

The information provided on the drawings dated 1994 listing the total number of sinks/tanks (23 UL Sinks for room 212 and 34 Tanks for room 245). These numbers could not be reconstructed to account for the delta between the drawings and the remaining pieces of equipment located in place to be removed.

The following describes the remaining pieces of equipment to be removed from room 212 and room 245

Room 212 has 18 individual pieces of equipment. In the Nickel Plating line, NDT # 2321 has a partition, which could be classified as having 2 tanks similar to the Cascade Rinse line, NDT # 2338 and the Cyanide Plating line NDT # 2342, 2343 and 2344. If this were the case, we would have 23 tank in 18 pieces of equipment plus 2 Process Waste Sinks.

Room 245 has only 21 tanks plus 2 Process Waste Sinks. There are no partitions in any tank except for the Branson Degreaser which has a very small partition at the bottom of the tank. It cannot be classified as having 2 tanks. A drawing (27780-0010) for Rm 245 shows Line 1 installed with 10 tanks. Line 1 has been removed. The 34 tanks listed on the CDD drawing cannot be matched. If all the lines were operational, there could have been a total of 38 tanks in Room 245.

On March 3, 2003, at 1449, the State (Hindman) had the following question related to the remaining items listed for Building 444 in Work Package T0110699. Responses to these questions were emailed to the State (Hindman) on March 17, 2003, at 1459.

Question 1 - The Closure Description Document (CDD) shows additional items that might be or are process waste equipment, including:

- Process Waste (PW) Sumps #1, #2, #3, & #4, Roll Filter, and RCRA Tank in Room 1;
- Unlabeled (UL) Sink in Room 3;
- PW Sumps #2 & #3 in Room 8;
- UL Floor Drain in Room 9;
- PW Sumps #5 & #6 in Room 10;
- UL Sink in Room 11;
- UL Sinks #1 & #2 in Room 101F;
- PW Sinks #1 & #2 in Room 106;
- PW Sinks #1 & #2 in Room 107B;
- UL Sink in Room 109;
- Funnel Drain in Room 143H;
- UL Floor Drain in Room 203; and
- UL Floor Drain #3 in Room 204.

What is the status of these items? What are the plans for their disposition?

Question 1 Responses -

Room 1, PW Sumps #1, #2, #3, #4, Roll Filter & RCRA Tank

These items were evaluated to be Process Waste equipment required to support building operations until D&D. Prior to facility demolition they will be removed as Process Waste and disposed of as LLMW.

NOTE: A Work Package will be developed for the removal of all remaining essential Process Waste Equipment not covered by T0110699. In addition a Work Package will be developed for the removal of all sanitary waste systems from the B444 complex.

Room 3, Unlabeled (UL) Sink

This unit is labeled and drains to the Sanitary Waste System. This unit will be covered by a Work Package for the removal of the B444 Facility Sanitary Waste Systems.

Room 8, PW Sumps #2 & #3

These items were evaluated to be Process Waste equipment required to support building operations until D&D. Prior to facility demolition these sumps will be removed as Process Waste and disposed of as LLMW.

Room 9, UL Floor Drain

Labeled PROCESS WASTE. Currently used as drain for "B" Sprinkler System at the fire line entry into the building. After the sprinkler system is deactivated and isolated the drain will be removed prior to facility demolition.

Room 10, PW Sumps #5 & #6

These items were evaluated to be Process Waste equipment required to support current building operations until D&D. Prior to facility demolition these sumps will be removed as Process Waste and disposed of as LLMW.

Room 11, UL Sink

Listed on Process Sinks, Sumps and Ancillary Equipment Location drawing as a Water Fountain. The water fountain was located between the sink and the sump and was removed earlier by the facility. (Photograph was provided to the State showing that potable water supply and drain are capped).

Room 101F, UL Sinks #1 & #2

Sanitary Waste, restroom wash sinks. These units will be covered by the Work Package to be developed for the removal of the B444 Facility Sanitary Waste Systems.

Room 106, PW Sinks #1 & #2

PW Sink #1 is a Hand Wash Fountain and will be handled as Sanitary Waste. PW Sink #2 was an unlabeled Utility Sink, which has been confirmed to be a Process Waste Sink. This sink has been added to the existing building equipment list of items to be removed prior to D&D. At that time the sink will be handled as Process Waste along with the remaining Process Waste items required to support current building operations.

Room 107B, PW Sink #1 & #2

The Delta Sonic cleaning station, which has two sinks or tanks in the unit, this unit has been added to the existing building equipment list of items to be removed prior to facility demolition. At that time the sink will be handled as Process Waste along with the Process Waste items required supporting current building operations.

Room 109, UL Sink

The UL Sink is actually a holding tank and part of the UL Sump. This tank will be removed along with the sump in Work Package, T0110699. (Photograph was provided to the State).

Room 143H, Funnel Drain

The funnel drain (air gap drain for backflow preventers) was previously removed by the facility. (Photograph was provided to the State showing the backflow preventer drain line).

Room 203, UL Floor Drain

The floor drain was sealed with grout previously by the facility.

Room 204, UL Floor Drain

The floor drain was sealed with grout previously by the facility.

Question 2 - The "Hot Side Process Waste Equipment List, Bldg 444" in Appendix 7 of Work Package T0110699 includes the following items that are not included in the CDD:

Item #4 described as "Sink" in Room 203; and

Item #3 described as "Sink (Branson Degreaser)" in Room 245.

What is the status of these items? Are they Process Waste related?

Will they be disposed of as hazardous/mixed waste?

Question 2 Response

Room 203, Item # 4

Item # 4 is a cleaning station similar to PW Sink # 5 & #6 and is piped to the same PW drain as sinks # 5 & # 6. (Photograph was provided to the State). This will be removed with sinks # 5 and # 6 and disposed of as LLMW under this Work Package (T0110699).

Room 245, Item #3, Sink (Branson Degreaser)

The Degreaser was evaluated to be part of the equipment listed for Room 245 on the Process Sinks, Sumps, and Ancillary Equipment Location drawing. Revised the description on the Equipment List and Work Instructions to Branson Degreaser, eliminated the reference to Sink. This unit will be removed under this Work Package (T0110699) and disposed as LLMW.

Question 3 - For the work instructions for Room 203, the work instructions appear to have been inadvertently switched for items #2 and #3 as listed on the "Hot Side Process Waste Equipment List, Bldg 444."

Contact Record 04/08/03

Question 3 Response

Agree the Equipment list has been revised to match the Work Instructions; Room 203 items 2 and 3 have been reversed.

Question 4 - LO/TO Sketch SK-444-PW-MECH-245 shows valve PA-V-1 twice. It appears that one of these valves should be labeled PA-V-2.

Question 4 Response

Corrected LO/TO sketch SK-444-PW-MECH-245.

On April 3, 2003, at 1030, a cross-walk matrix listing what items were included in the CDD and Work Package T0110699 was provided to the State (Hindman). During this meeting, it was agreed that additional process waste items could be added to the CDD utilizing the Consultative Process, and documenting this in a contact record.

On April 4, 2003, at 1451, the State (Hindman) agreed that all of his comments associated with Work Package T0110699 had been adequately addressed, and concurred with the removal of the remaining items listed in Appendix 7 of Work Package T0110699.

On April 8, 2003, at 1155, the State (Hindman) agreed that all of the process waste items in Work Package T0110699 that were not specifically included in the CDD are now added to the scope of work covered by the CDD as documented in this contact record.

Contact Record Prepared By: C. J. Freiboth

Required Distribution:

P. Arnold, K-H	R. Leitner, K-H
C. Deck, K-H	J. Mead, K-H
R. DiSalvo, RFFO	S. Nesta, K-H
C. Gilbreath, K-H	K. North, K-H
S. Gunderson, CDPHE	W. Prymak, DOE
T. Hopkins, K-H	T. Rehder, USEPA
L. Kilpatrick, K-H	D. Shelton, K-H
J. Legare, RFFO	C. Zahm, K-H

Additional Distribution:

C. J. Freiboth, K-H
J. Hindman, CDPHE
S. Tower, DOE

